

REMARKS

Claims 1-34 are pending in this application. By this Amendment, claims 1-13, 15-24, 26, 28, 30 and 32-34 are amended to correct antecedent basis and clarify the claims.

Reconsideration of the application in view of the above amendments and the following remarks is respectfully requested.

Response to Restriction Requirement

Applicants provisionally elect Group I, claims 1, 7-14, 16-18, 24-31, 33 and 34, with traverse.

National stage applications filed under 35 U.S.C. §371 are subject to unity of invention practice as set forth in PCT Rule 13, and are not subject to U.S. restriction practice. *See* MPEP §1893.03(d). PCT Rule 13.1 provides that an "international application shall relate to one invention only or to a group of inventions so linked as to form a single general inventive concept." PCT Rule 13.2 states:

Where a group of inventions is claimed in one and the same international application, the requirement of unity of invention referred to in Rule 13.1 shall be fulfilled only when there is a technical relationship among those inventions involving one or more of the same or corresponding special technical features. The expression "special technical features" shall mean those technical features that define a contribution which each of the claimed inventions, considered as a whole, makes over the prior art.

A lack of unity of invention may be apparent "*a priori*," that is, before considering the claims in relation to any prior art, or may only become apparent "*a posteriori*," that is, after taking the prior art into consideration. *See* MPEP §1850(II), quoting *International Search and Preliminary Examination Guidelines* ("ISPE") 10.03. Lack of *a priori* unity of invention only exists if there is no subject matter common to all claims. *Id.* If *a priori* unity of invention exists between the claims, or, in other words, if there is subject matter common to

all the claims, a lack of unity of invention may only be established *a posteriori* by showing that the common subject matter does not define a contribution over the prior art. *Id.*

Page 3 of the Restriction Requirement states that claims corresponding to Group I and II lack the same or corresponding special technical features because each set of claims corresponding to a group differs significantly in the relationship between the processor(s) and the control units (i.e., the technical relationship among the special technical features is distinct), as well as varying control unit and processor functions.

However, technical features from claims from each respective group do not differ significantly from each other to require a restriction requirement because all claims share common subject matter. For example, independent claim 1, corresponding to Group I, and claims 2-5, corresponding to Group II, for example, each recite identical features of "a sensing unit for sensing an operation request with respect to at least one control unit." Claims 18-22 recite "sensing means for sensing an operation request with respect to at least one control unit," which is the same subject matter as in independent claims 1-6.

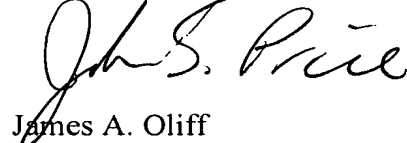
Accordingly, Applicants assert that independent claims 1-6 and 18-22 share common subject matter, as disclosed above, and, therefore, *a priori* unity of invention exists between all the claims. Thus, for the present application, a lack of unity of invention may only be determined *a posteriori*, or in other words, after a search of the prior art has been conducted and it is established that all the elements of the independent claim are known. *See* ISPE 10.07 and 10.08.

Thus, withdrawal of the Restriction Requirement is respectfully requested.

In view of the foregoing, it is respectfully submitted that this application is in condition for allowance. Favorable reconsideration and prompt allowance are earnestly solicited.

Should the Examiner believe that anything further would be desirable in order to place this application in even better condition for allowance, the Examiner is invited to contact the undersigned at the telephone number set forth below.

Respectfully submitted,



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